

UNITED STATES DISTRICT COURT

FILEDfor the
Western District of TexasAugust 11, 2022
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

United States of America

v.

Case No. SA:22-MJ-01210

BY: Jackson
DEPUTY

Alejandro Richard Velasquez Gomez

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 18 and 22, 2022 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 875(c)	Threatening Interstate Communications (July 18, 2022)
18 U.S.C. 2252A(a)(5)(B)	Possession of Child Pornography (July 22, 2022)

This criminal complaint is based on these facts:

See attached affidavit

 Continued on the attached sheet.

JESSICA STONE

Digitally signed by JESSICA STONE
Date 2022.08.10 19:30:29 -05'00'*Jessica Stone*
Complainant's signature

Jessica Stone, FBI SA

Printed name and title

Sworn to telephonically and signed electronically
~~Sworn to before me and signed in my presence.~~Date: August 11, 2022*Ely S. C.*
Judge's signatureCity and state: San Antonio, Texas

ELIZABETH CHESTNEY, U.S. Magistrate Judge

Maximum Penalties: Possession of Child Pornography -20 years confinement, \$250,000 fine, life supervised release, \$100 mandatory special assessment, \$5,000 JVTA assessment, up to \$17,500 pursuant to 18 USC 2259A, restitution, forfeiture, and registration as a sex offender.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN THE MATTER OF THE ARREST OF

ALEJANDRO RICHARD VELASQUEZ
GOMEZ

FOR VIOLATIONS OF 18 U.S.C. §§ 875(c)
and 2252A(a)(5)(B)

Case No. SA:22-MJ-01210

Filed Under Seal

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jessica Stone, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a criminal complaint and arrest warrant ALEJANDRO RICHARD VELASQUEZ GOMEZ.

2. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since August 2020. I am currently assigned to the Joint Terrorism Task Force (JTTF) in the FBI San Antonio Division. I investigate, manage, and support domestic terrorism investigations which often involve violations of Title 18 of the United States Code. I have assisted in the preparation of search warrant applications, conducted, or participated in physical and electronic surveillance, assisted in the execution of search warrants, debriefed informants and reviewed other pertinent records.

3. The facts in this affidavit come from my personal observations, training, experience, and other law enforcement personnel who have provided me with information on this investigation, including agents in the FBI's Violent Crimes Against Children (VCAC) unit, who possess specialized knowledge and expertise involving investigation and prosecution of child pornography crimes. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience, as well as the counsel of other agents, and the facts as set forth in this affidavit, there is probable cause to believe that **VELASQUEZ** violated

18 U.S.C. §§ 875(c) (threatening interstate communications) and 2252A (possession of child pornography).

PROBABLE CAUSE FOR 18 U.S.C. §§ 875(C)

5. On July 19, 2022, FBI San Antonio received information from FBI Phoenix concerning a July 18, 2022, Instagram post by user @LatinoZoomerPolitics/Account ID [REDACTED], display name “LatinoZoomer”. The post included the following message:

6. Based on my training and experience, I know the wording in this post is similar to the message left by “incel” mass



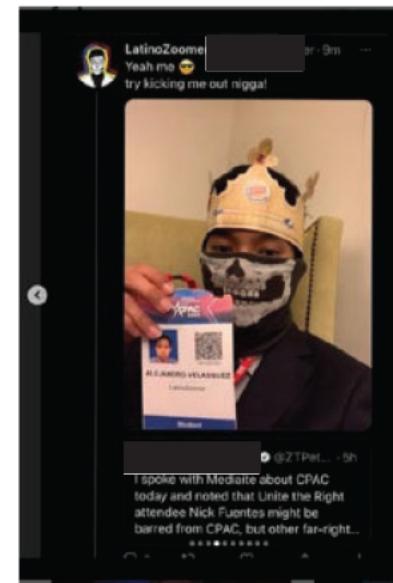
shooter, Elliot Rodger, who filmed a video from inside his car discussing his “day of retribution” before he killed six people. I have previously reviewed the archived video created by Elliot Rodger. In the video, Rodger stated “Tomorrow is the day of retribution. The day in which I will have my revenge against humanity. Against all of you.” I also know that “incel” refers to “Involuntary Celibate” ideology. This ideology has an extreme hatred towards, and endorses violence against, women and sexually active people. Rodger is an avatar of the Incel movement.

7. I have learned that SAS in @LatinoZoomerPolitics post stands for Student Action Summit. Open source checks I conducted showed SAS is a conference hosted by a conservative group, Turning Point USA. This conference was held in Tampa, Florida from July 22 - 24, 2022.

8. The review of @LatinoZoomerPolitics publicly accessible Instagram page identified a post from May 2, 2022 indicating the user graduated from Karen Wagner High School. I know that Karen Wagner High School is located in San Antonio, Texas.



9. Additional @LatinoZoomerPolitics Instagram posts I saw showed the user holding a CPAC name tag bearing the name "Alejandro Velazquez." This post was originally made by Twitter account @MestizoZoomer with a display name of LatinoZoomer. A screen shot of that post was taken and then reposted by the @LatinoZoomerPolitics Instagram account. I have determined that VELASQUEZ is the owner of the Twitter account @MestizoZoomer because it has the same display names as @LatinoZoomerPolitics/Account ID [REDACTED] referenced in paragraph 5. Additionally, I have compared the profile picture associated with the @MestizoZoomer Twitter account and believe it is VELASQUEZ.



10. Using law enforcement databases, I located an Alejandro Velazquez with a home address in San Antonio, Texas; D.O.B. 08/XX/2003; and phone number 210-XXX-4121. I also obtained a copy of that Alejandro Velazquez's driver's license photo. I compared the photo in the July 18, 2022, Instagram post above in paragraph 5 to



the driver's license photo. Based on my review, I believe Alejandro VELASQUEZ, DOB 8/XX/2003, is the person responsible for the July 18, 2022, Instagram post.

11. Tampa Police Department learned of VELASQUEZ' July 18, 2022, Instagram post and believed the post to be a credible threat against the participants attending the SAS conference. On July 21, 2022, Tampa PD obtained an arrest warrant for VELASQUEZ, charging him with having violated Florida Criminal Law, 836.10, written or electronic threats to kill, do bodily injury, or conduct a mass shooting or an act of terrorism. The charge is pending.

12. I know from my investigation, including communications with Turning Point USA, that Turning Point was aware of VELASQUEZ' Instagram post stating that he planned to attend the SAS conference.

13. Comments posted in response to VELASQUEZ's Instagram post indicate that people who viewed it contemporaneously took it seriously, stating for example "I have alerted the FBI" (see the second to last comment in the image associated with paragraph 5).

14. I also know from my investigation that a liaison at American Airlines confirmed that Velasquez had purchased a valid ticket to fly from Austin to Tampa on July 22. I also learned that VELASQUEZ cancelled his plane ticket the night before his flight.

15. On July 22, 2022, local law enforcement arrested VELASQUEZ pursuant to the Tampa, Florida warrant and FBI San Antonio executed a federal search warrant for his phone, 22-MJ-1105.

16. While executing the search warrant for his phone VELASQUEZ told me that he had posted the message referenced in paragraph 5 and that he had taken that photo in that Instagram post. He explained to me that he intended the post to evoke Elliot Rodger and was familiar with Elliot Rodger due to extensive online research.

**PROBABLE CAUSE FOR 18 U.S.C. §§ 2252A
(POSSESSION OF CHILD PORNOGRAPHY)**

17. As mentioned in paragraph 15, I executed a federal search warrant, 22-MJ-1105, on July 22, 2022,¹ and seized VELASQUEZ's cell phone. Law enforcement transported his cell phone to the FBI that day and forensically imaged it for my review.

18. I began my review of his cell phone on July 25, 2022. On August 3, I located a screenshot of three images posted on an unidentified social media platform stored on his cell phone. The three images within the screenshot appeared to be minors, nude, and displayed in an overtly sexual manner. I requested the assistance of agents assigned to the FBI's Violent Crimes Against Children (VCAC) unit to review these images to assist in determining if the images met the definitions of unlawful pornography involving minor children.

19. On August 3, 2022, agents with the FBI's VCAC unit conducted a preliminary review of these images. VCAC agents reviewed the screenshot and advised:

File Name: 5005.JPG is a "screenshot" depicting three separate color images. The top image depicts two prepubescent children with their mouths on a man's genitals. The middle image depicts a prepubescent girl lying down with her legs up and a man's penis touching the outside of the girl's vagina. The bottom image depicts a pant-less man standing over a naked crying baby.
and that these depictions met the statutory definitions of "child pornography" referenced in 18 U.S.C. § 2252A and/or "sexually explicit conduct" referenced in § 2251 and § 2252.

CONCLUSION

20. Based on the forgoing, I request that the Court issue the complaint and arrest warrant because there is probable cause to believe that:

¹ In prior submissions related to this case, I mistakenly listed the date I served the warrant as July 21. However, the correct date is July 22, 2022.

- a. On or about July 18, 2022, in the Western District of Texas, ALEJANDRO RICHARD VELASQUEZ GOMEZ knowingly and willfully did transmit in interstate and foreign commerce from Texas to Florida and other locations a threat to injure unnamed individuals at or near Student Action Summit held in Tampa Florida from July 22-24, 2022, specifically that he would take “revenge” on the attendees in a manner similar to the mass killing carried out by Elliot Rodger in Rodger’s so-called “day of retribution,” all in violation of 18 U.S.C. § 875(c).
- b. On or about July 22, 2022, in the Western District of Texas, ALEJANDRO RICHARD VELASQUEZ GOMEZ knowingly possessed on his cell phone any matter that contained an image of child pornography, as defined in Title 18 United States Code Section 2256(8); and that such child pornography had been transported in interstate or foreign commerce by any means, including by computer, or that such child pornography had been produced using materials that had been mailed or shipped or transported in interstate or foreign commerce by any means, including by computer; and the Defendant knew that such items constituted child pornography, all in violation of 18 U.S.C. § 2252(a)(5)(B).

Respectfully submitted,

JESSICA
STONE

Digitally signed by
JESSICA STONE
Date: 2022 08 10
19:31:14 -05'00'

Jessica L. Stone, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to telephonically on August 11, 2022


ELIZABETH S. CHESTNEY
UNITED STATES MAGISTRATE JUDGE